

REMARKS

Claims 1–6, 9–11, and 17 and 51–70 are pending in this application. All claims have been rejected by the Examiner. Reconsideration of the above-identified application in view of the following remarks is respectfully requested.

Objection Raised in the Notice Dated 3/09/04

The Examiner objected to the claims as not being properly identified with respect to their status. A corrected section of the non-compliant amendment has been submitted in this response, properly identifying the status of all claims in the Applicants' application. Applicants believe that these corrections overcome the Examiner's objections to Applicants' claims.

Arguments/Remarks in Response to the Office Action dated November 22, 2002

1. Claims 1-6, 9-11, 17 and 58 are rejected under 35 USC §112 as being indefinite. Claims 1, 4, and 58 have been amended to correct antecedent basis rejections. Withdrawal of the rejections is respectfully requested.

2. The nonstatutory double patenting rejection is traversed by the applicants, however, solely for the purpose of expediting the patenting process in a manner consistent with the PTO's Patent Business Goals, 65 Fed. Reg. 54603 (September 8, 2000), a terminal disclaimer in compliance with 37 CFR 1.321(c) is attached disclaiming the terminal part of any patent granted that would extend beyond the expiration date of any patent issued for copending application 09/800,000.

3. Claims 1–6, 10–11, and 17 and 51–70 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Aoki (US Pat. No. 5,509,353) in combination with Gasparrini et al. (US Pat. No. 5,368,157) and Knaul et al. (US Pat. No. 4,860,883). Applicants contend that

there is no motivation to combine the above references and a prima facie case of obviousness has not been made.

Aoki teaches a complex system using supply tubes (78) and a liquid reservoir (77) to pump the cleaning fluid to the sponge. A complex pumping and delivery systems is used to deliver a cleaning fluid to a sponge. The cleaning fluid “drips” onto cleaning sheet (59) through a manifold or guiding member (74) that has a series of small holes that apply the cleaning fluid. Supply tubes (78) carry cleaning fluid from a source (not shown) through a coupler (79) so that cleaning fluid passes or is pumped from the supply tube (78) to liquid reservoir (77). (See Col. 3, lines 60-67; Col. 4, lines 1-15).

The Gasparrini reference teaches a pre-packaged, pre-soaked cleaning system inserted into a sleeve for storage prior to use. (See, Col. 3, lines 55-68 and Col. 4, lines 1-17).

The Knaul reference teaches a conveyor belt washed by a cleaning roller where excess cleaning fluid is squeezed out by a pressure roller (See, Abstract).

There is no suggestion or motivation in Aoki to use the pre-packaged system in Gasparrini or use a pressure roller for the removal of excess cleaning fluid as in Knaul. In fact, Aoki teaches away from the system in Gasparrini by requiring a spray apparatus. Gasparrini specifically does not require such an apparatus to apply cleaning fluid. Gasparrini differs from the present invention in that the Gasparrini reference requires a sleeve for storage prior to use. There is no motivation to use the pressure roller in Knaul, and in fact Aoki teaches away from Knaul such that removal of cleaning fluid is not done and a sponge is utilized to distribute the cleaning fluid on the cleaning cloth. If the pressure roller in Knaul was used in Aoki, the sponge would be dry or at least give an uneven distribution of cleaning fluid which is contrary to the teachings of Aoki. Gasparrini also teaches against the use of the cleaning roller by specifically

calling out that the immersed fabric strip is suspended in a position to allow excess cleaning fluid to drain off (Col. 7, lines 1-2). In addition, Knaul teaches the use of a spray bar to dispense the cleaning solution that is opposed to what the applicants claim.

A distinct advantage of the cleaning system of the Applicants' claimed invention is that it eliminates the need for complex apparatus, such as pumps, spray bars, manifold lines, valves and the like, especially as part of the automatic blanket cleaning systems used on printing machinery to introduce cleansing solvents or solutions to the cleaning fabric. (See, Applicants Specification page 32, lines 10-15). All independent claims have been amended to reflect this advantage.

Clearly there are substantial structural and functional differences between what the references teach and what the Applicants now claim. The Applicants claim dipping a cleaning fabric supply roll into a vat or container of solvent or cleaning fluid. Dipping is different than soaking as the examiner stated was taught in Aoki and Gasparini. There is a temporal difference between dipping and soaking. The ordinary meaning of dipping is to "plunge or immerse under the surface (as of a liquid)." The ordinary meaning of soaking is to "lie immersed in liquid (as water)." This temporal difference is now reflected in the amended claims.

In conclusion, the Applicants claim the introduction of the cleaning solvent to the cleaning fabric eliminates the need for using pumps, spray bars, manifold lines and valves. The above cited references, on the other hand, teach dripping or spraying. Dripping is defined as "to let fall in drops" and spraying is defined as to "disperse or apply as a spray." In order for the apparatus taught in these references to drip or spray cleaning fluid, complex apparatus is required, such as pumps, spray bars, manifold lines, valves and the like. These references teach away from what the Applicants claim because the use of complex apparatus required by the cited references is exactly what the Applicants' invention claims to eliminate.

Applicants respectfully submit that the above references do not teach or suggest the subject matter claimed, and in fact teach away from the Applicants claimed invention by requiring complex apparatus to apply the cleaning solution. Since the references cited do not teach or suggest what the Applicants have claimed, a prima facie case of obviousness has not been made. Withdrawal of the rejections is respectfully requested.

CONCLUSION

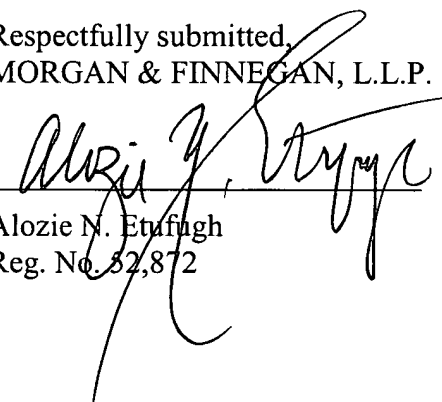
In light of the foregoing remarks and amendments, Applicants believe that all pending claims are in condition for allowance, and earnestly request such allowance. If the Examiner has any questions concerning this response, the Examiner is invited to contact the undersigned attorney.

The Commissioner is hereby authorized to charge any additional fees which may be required for the timely consideration of this amendment under 37 C.F.R. §§ 1.16 and 1.17, or credit any overpayment to Deposit Account No. 13-4500, Order No. 0140-4126US5. A **DUPLICATE COPY** of this page is enclosed.

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Respectfully submitted,
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